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October 12, 2019

via ECF

Hon. Paul A. Crotty, U.S.D.J.
United States District Court
500 Pearl Street, Chambers 1350
New York, NY 10007

Re: **Malibu Media, LLC, v. [REDACTED]**
Case no. 1:18-cv-05608-PAC
• Motion and Stipulation Extending Time to Respond to Complaint

Dear Judge Crotty:

I represent the defendant in the above matter. Please allow this letter to serve as a Motion to Extend the Defendant's Time to Respond to the Complaint filed. A proposed Stipulation Extending Time to Respond to Complaint by thirty (30) days is attached hereto. Plaintiff consents to this request.

Defendant's response to the Complaint is due to be filed by the end of October 22, 2019. There have been no previous requests to extend defendant's time to file a response to the Complaint. The parties have been having settlement negotiations with the hope and expectation of resolving this matter before any responsive pleading would need to be filed. The parties anticipate some back and forth in the negotiations before we know whether the case can be resolved amicably, or whether a responsive pleading is needed, leading towards discovery, and so forth.

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Accordingly, for the foregoing reasons, defendant respectfully requests that the Court grant this Motion and enter an Order on the attached Stipulation Extending Time to Respond to the Complaint.

Respectfully submitted

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cc: Kevin T. Conway, Esq. (*via email*)